



Frank R. Ellerbe, III

1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202

December 21, 2015

PH
(803) 779-8900 | (803) 227-1112 *direct*

FAX
(803) 744-1556

fellerbe@robinsonlaw.com

VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

**Re: SCTC Petition for a Determination that Wireless Carriers are Providing
Radio-Based Local Exchange Services in South Carolina that Complete with
Local Telecommunications Service Provided in the State
Docket No. 2015-290-C**

Dear Ms. Boyd:

I am writing on behalf of the South Carolina Cable Television Association (SCCTA) to inform the Commission that we will not be submitting a separate proposed order in the referenced docket. We have had an opportunity to review the proposed orders submitted today by the Office of Regulatory Staff and the South Carolina Telephone Coalition. The SCCTA fully supports the Findings of Fact and Conclusions of Law contained in both of those proposed orders.

With respect to the motion made by the CTIA – The Wireless Association to dismiss the proceeding, the position of the SCCTA is that motion should be denied for the reasons that I stated during the hearing. See pages 64 through 70 of the transcript. As explained in that argument, the SCCTA believes that wireless companies are competing with landline telephone services and should thus be supporting the USF. A finding of competition and an order requiring wireless companies to begin supporting the USF is not only overwhelmingly supported by the record, it is necessary for the USF to be brought into compliance with federal and state statutory provisions that require the USF to be supported in an equitable and non-discriminatory manner.

The SCCTA urges the Commission to proceed to make the finding that wireless companies are competing with landline companies in the provision of local telecommunications service in South Carolina.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

A handwritten signature in black ink, appearing to read "Frank R. Ellerbe, III". The signature is fluid and cursive, with a prominent "F" and "E".

Frank R. Ellerbe, III

FRE/tch
Enclosure
cc/enc:

F. David Butler, Esquire, Hearing Examiner (via email)
M. John Bowen, Jr., Esquire (via email)
Margaret M. Fox, Esquire (via email)
Bradley S. Wright, Esquire (via email)
Jeffrey M. Nelson, Esquire (via email)
Andrew M. Bateman, Esquire (via email)
Charles L. A. Terreni, Esquire (via email)
Scott A. Elliott, Esquire (via email)
Jeanne W. Stockman, Esquire (via email)
John J. Pringle, Jr., Esquire (via email)
Patrick W. Turner, Esquire (via email)
William E. DuRant, Jr., Esquire (via email)
Burnet R. Maybank, III, Esquire (via email)
C. Jo Anne Wessinger Hill, Esquire (via email)
Steven W. Hamm, Esquire (via email)